

RUSS, AUGUST & KABAT

Marc Fenster (SBN 181067)
mfenster@raklaw.com
Reza Mirzaie (SBN 246953)
rmirzaie@raklaw.com
Neil A. Rubin (SBN 250761)
nrubin@raklaw.com
Jacob Buczko (SBN 269408)
jbuczko@raklaw.com
James A. Milkey (SBN 281283)
jmilkey@raklaw.com
James Tseui (SBN 285530)
jtseui@raklaw.com
Amy E. Hayden (SBN 287026)
ahayden@raklaw.com
Christian Conkle (SBN 306374)
cconkle@raklaw.com
Qi (Peter) Tong (SBN 300347)
ptong@raklaw.com
Jonathan Ma (SBN 312773)
jma@raklaw.com
Daniel Kolko (SBN 341680)
dkolko@raklaw.com
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-9226
Attorneys for Defendant,
VirtaMove Corp.

[Additional counsel listed on signature page.]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

RED HAT, INC.,

Plaintiff,

v.

VIRTAMOVE CORP.,

Defendant.

Case No. 5:24-cv-04740-PCP

**STIPULATION TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE**

Judge: Hon. P. Casey Pitts
Location: Courtroom 8, 4th Floor

Pursuant to Civil L.R. 6-1 and your Honor's Standing Order for Civil Cases, Plaintiff Red Hat, Inc. and Defendant VirtaMove Corp. stipulate and request a continuance of the Initial Case Management Conference from January 14, 2025 at 1 p.m. to February 6, 2025 at 10 a.m., approximately sixty days after the hearing on VirtaMove's motion to dismiss this action.

The parties previously stipulated to a similar extension of the initial CMC to January 16, 2025, which the Court granted. Dkt. No. 33. At the time of that prior stipulation, the hearing on the motion to dismiss was set for November 14, 2024. *Id.* Since that stipulation was entered, the Court reset the motion to dismiss hearing to December 12, 2024 (Dkt. No. 38) and reset the initial CMC to January 14, 2025 (Dkt. No. 41). The parties therefore seek a modest additional extension of the initial CMC to comport with Your Honor's practice of allowing the parties to request an extension of "the initial CMC [to] 60 days or more after the hearing." Judge Pitts' Standing Order for Civil Cases at 3.

This extension is not sought for purposes of delay, but rather, in the event this case is not dismissed, to ensure the parties have sufficient time to confer pursuant to Rule 26(f) and this Court's local rules, as well as to prepare and submit to the Court a fulsome case management report. This extension will not affect any other pending case deadlines.

Dated: December 9, 2024

Respectfully submitted,

/s/ Reza Mirzaie

Marc Fenster (SBN 181067)

Email: mfenster@raklaw.com

Reza Mirzaie (SBN 246953)

rmirzaie@raklaw.com

Neil A. Rubin (SBN 250761)

nrubin@raklaw.com

Jacob Buczko (SBN 269408)

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jma@raklaw.com
Daniel Kolko (SBN 341680)
dkolko@raklaw.com
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-9226

*Attorneys for Defendant,
VirtaMove Corp.*

DATED: December 9, 2024

Respectfully submitted,

KIRKLAND & ELLIS LLP

/s/ Kyle Calhoun

Brandon H. Brown (SBN 266347)
Kyle Calhoun (SBN 311181)
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, CA 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500
Email: brandon.brown@kirkland.com
Email: kyle.calhoun@kirkland.com

Todd M. Friedman (*admitted pro hac vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: todd.friedman@kirkland.com

Attorneys for Plaintiff RED HAT, INC.

RUSS, AUGUST & KABAT